

Comments to proposed 2008 Standards- Dawn Hollingsworth

Section 146(a)2.B.

Why is the word "video" struck? Video is not film or still photography.

Table 146-C LIGHTING POWER ADJUSTMENT FACTOR

1. It seems the PAF on many categories are reduced at a time when we should be encouraging the use of controls. This seems like a double penalty. Reduction of the overall wattage allowances in many areas and a reduction of controls credits. Feels like double taxation.

2. I am not really sure why a programmable control system would be given a larger credit than a manual system. It seems to me that a manual system is more likely to be used less than a system that can be programmed to save energy.

Table 146-E COMPLETE BUILDING METHOD LIGHTING POWER DENSITY VALUES (WATTS/SQ.FT)

This seems to be a 27% reduction in office lighting. This is overly aggressive even with newer technologies. It is difficult to implement this in large institutions such as major universities who have a difficult time adopting new technology.

Table 146-F AREA CATEGORY METHOD

Commercial and industrial storage (refrigerated)

1. This is a problem. In unconditioned and refrigerated spaces such as cold storage, the performance of fluorescent systems is reduced due to the very low ambient temperature. These types of facilities are generally on a control system anyway, but they need more latitude in selection of sources. For security reasons, metal halide isn't a good option for them. I don't think it is a problem in conditioned spaces.

Offices- Greater than 250 sq. ft.

2. 1 would be more acceptable. 0.9 leaves little room are wall washing or other accent lighting expected in executive offices.

TABLE 147-B LIGHTING POWER AREA WATTAGE ALLOWANCE (AWA)

Lighting for Vehicle Service Station with or without Canopies in LZ 4

Reduce this to 2.2. That is plenty of AWA for this category in this Zone.